

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 15 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

No.)

WALTER WALLACE, JR. (a/k/a/ "Little
Walt")

or "Little Gun") and JERRY B.)

CHAMBERS)

(a/k/a "J"),)

Defendants.

4:15CR00324 HEA/NAB

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Beginning on a date unknown to the grand jury, but including on or about August 1, 2010, including on or about December 18, 2010, and continuing up to and not later than January 1, 2011, within the Eastern District of Missouri,

**WALTER WALLACE, JR. (a/k/a/ "Little Walt" or "Little Gun") and
JERRY B. CHAMBERS (a/k/a "J"),**

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree, with other persons both known and unknown to the federal grand jury, to commit an offense against the United States, to wit: to knowingly and intentionally possess with the intent to distribute marijuana, a Schedule I controlled substance drug.

In violation of Title 21, United States Code, Sections 846 and 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWO

The Grand Jury further charges that:

On or about December 18, 2010, in the City of Saint Louis, Missouri, within the Eastern District of Missouri,

**WALTER WALLACE, JR. (a/k/a/ "Little Walt" or "Little Gun") and
JERRY B. CHAMBERS (a/k/a "J"),**

the defendants herein, acting together, did knowingly possess, brandish and discharge one or more firearms, including a nine millimeter caliber semi-automatic pistol, in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States; to wit: conspiracy to knowingly and intentionally possess with the intent to distribute marijuana, as charged in Count One herein,

In violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A).

And in the course of this violation caused the death of Michael Hayes through the use of the firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, acting together, with malice aforethought, unlawfully killed Michael Hayes; by shooting him with the firearm, willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Sections 2 and 924(j)(1).

A TRUE BILL.

FOREPERSON

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